

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

RYAN SAWYERS,

*Plaintiff,*

v.

PRINCE WILLIAM COUNTY SCHOOL

BOARD, *et al.*,

*Defendants.*

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Case No. 1:22-cv-00667  
(CMH/IDD)

**PLAINTIFF'S FED. R. CIV. P. 26(a)(3) FINAL DISCLOSURES FOR TRIAL**

COMES NOW Plaintiff, Ryan Sawyers ("Sawyers"), by counsel, pursuant to Fed. R. Civ. P. 26(a)(3) and this Court's Orders of December 2, 2022, and April 11, 2023, and identifies his witnesses and exhibits for trial. Plaintiff reserves the right to present other witness testimony by deposition should any witness become unavailable to testify at trial in person.

**I. NAME OF EACH WITNESS PLAINTIFF EXPECTS TO CALL:**

**Witnesses Plaintiff expects to call (F.R.C.P. 26(a)(3)(A)(i):**

1. Ryan Sawyers
2. Dr. Michael Bishop
3. Dr. LaTanya McDade
4. Dr. Carol Flenard (as corporate designee of Prince William County School Board)
5. Justin Wilk
6. Michelle Fair Kincaid
7. Dr. Babur Lateef
8. Ms. Diana Gulotta

9. Mary McGowan
10. Soledad Araya
11. Custodian of Records for Prince William County School Board

**II. NAME OF EACH WITNESS WHO MAY BE CALLED:  
F.R.C.P. 26(a)(3)(A)(ii):**

1. Wade Anderson
2. Guy Morgan
3. Dr. Steven Walts
4. Carla Drew
5. Matthew Guilfoyle
6. Karla Tilgner
7. All witnesses identified by Defendant Prince William County School Board to whom Plaintiff does not object.
8. All witnesses identified by Defendant Michael Bishop to whom Plaintiff does not object.
9. Rebuttal and impeachment witnesses who need not be identified.

**III. DESIGNATION OF WITNESSES WHOSE TESTIMONY IS  
EXPECTED TO OR MAY BE PRESENTED BY DEPOSITION**

1. Dr. Carol Flenard (as corporate designee of Prince William County School Board)

**IV. IDENTIFICATION OF EACH DOCUMENT OR OTHER EXHIBIT:  
F.R.C.P. 26(a)(3)(A)(iii):**

Plaintiff submits the following lists of exhibits that it may offer at trial. Plaintiff reserves the right to offer additional exhibits, including documents identified by either Defendant to which Plaintiff does not object and documents used strictly for impeachment or rebuttal purposes, which need not be specifically identified under F.R.C.P. 26(a)(3)(A)(iii).

Ex. #	Description	ID	Admitted
1	Screen Capture of @PioneersPHS from Ryan Sawyers' Twitter login RS000333		

2	Screen Capture of @PioneersPHS without Twitter login RS000334		
3	Screen Capture of @PioneersPHS without Twitter login RS000388		
4	Screen Capture of @PioneersPHS from Ryan Sawyers' Twitter login RS000337		
5	Screen Capture of @PioneersPHS from Ryan Sawyers' Twitter login RS000336		
6	Video of scrolling through Twitter Feed without login RS000453		
7	Screen capture of baseball search term on @PioneersPHS feed RS000342		
8	Email correspondence between Ryan Sawyers & Soledad Araya RS000330-RS000332		
9	Email correspondence between Ryan Sawyers & Soledad Araya RS000467-RS000469		
10	Answers to Requests for Admissions filed by Michael Bishop in Case No. CL19-7101 RS001179-RS001184		
11	Archived Electronic Copy of Twitter Account BISHOP_000084		
12	Screen captures from Twitter Account BISHOP_000001-BISHOP_000004		
13	Screen captures from Twitter Account BISHOP_000005-BISHOP_000013		
14	Screen captures from Twitter Account BISHOP_000014-BISHOP_000015		
15	Communication Guidelines Document dated January 21, 2021 BISHOP_000016-BISHOP_000055		
16	Screen captures of PWCSB training modules BISHOP_000056-BISHOP_000060		
17	PWCS Human Resources Regulation 503.02-1 BISHOP_000079-BISHOP_000083		
18	Plaintiff's Rule 30(b)(6) Notice of Deposition to PWCSB		
19	Prince William County School Board's Objections and Responses to Plaintiff Ryan Sawyers' First Set of Interrogatories		
20	Regulation 910-1 adopted September 25, 2019 PWCSB010306-PWCSB010307		
21	Defendant Michael Bishop's Answers & Objections to Plaintiff Ryan Sawyers First Interrogatories to Defendant Michael Bishop		
22	Policy/Regulation Justification for Regulation 910-1 PWCSB010308-PWCSB010312		
23	Communication Guidelines Slide Deck PWCSB007509-PWCSB007550		
24	Email correspondence between Diana Gulotta and Carol Marchant PWCSB008161		
25	Email correspondence between Karla Tilgner and Marcia Jeans PWCSB0071		
26	Regulation 503-1 PWCSB00013831-PWCSB00013834		
27	Performance Review of Dr. Michael Bishop PWCSB00015832-PWCSB00015833		
28	Email correspondence between Michael Bishop & PWCS Parent PWCSB000945-PWCSB000947		

29	Slide Deck for Incoming Freshmen PWCSB000043-PWCSB000046		
30	Email correspondence between Michael Bishop & Wade Anderson PWCSB000927-PWCSB000928		
31	Formal Complaint re Social Media Use PWCSB000373-PWCSB000379		
32	Memorandum to School Board PWCSB008645-PWCSB008647		
33	Q&A re Hot Topics PWCSB010160-PWCSB010166		
34	Email correspondence between Soledad Araya and Michelle Kincaid PWCSB000720-PWCSB000724		
35	Email correspondence between Soledad Araya and Michelle Kincaid PWCSB000906-PWCSB000908		
36	@PioneersPHS Twitter Profile		
37	Email correspondence between Soledad Araya and Guy Morgan		
38	Email correspondence between Soledad Araya and Guy Morgan		
39	Diana Gulotta Tweet @PioneersPHS		
40	Tremblay & Smith bills for legal services SAWYERS-001987-SAWYERS-002013		
41	Tremblay & Smith summary of expenses SAWYERS-0001986		
42	CarltonFields bills for legal services SAWYERS-001959-SAWYERS-001985		

**RYAN SAWYERS**

BY COUNSEL

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing pleading was sent via ECF  
this 21st day of April, 2023, to the following:

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